



NEW JERSEY
NEW YORK

61 SOUTH PARAMUS ROAD, SUITE 250
PARAMUS, NEW JERSEY 07652

ALEX J. KEOSKEY, ESQ.
AKEOSKEY@DECOTIISLAW.COM
201.347-2107

TELEPHONE: (201) 928-1100
TELEFAX: (201) 928-0588
WWW.DECOTIISLAW.COM

March 18, 2020

VIA CM/ECF

Hon. Lois H. Goodman, U.S.M.J.
United States District Court
District of New Jersey
50 Walnut Street, Room 4015
Newark, New Jersey 07102

Re: Brathwaite v. City of Long Branch, et al.
Docket No.: 3:19-cv-18332

Dear Judge Goodman,

Our law firm represents Defendant Officer David Stone in the above-referenced matter. Pursuant to the discussion during our status telephone conference among all parties' counsel this afternoon, and by consent of all parties, I am hereby requesting an extension of time for parties to respond to all written discovery. We are requesting an extension of thirty (30) days, due to the difficulty in meeting with and/or obtaining such answers from our clients in light of the current Pandemic.

We thank Your Honor for her consideration of this request.

Respectfully submitted,

DeCotiis, FitzPatrick, Cole & Giblin, LLP

/s/ Alex J. Keoskey

Alex J. Keoskey, Esq.

AJK/si

Cc: Kevin T Flood, Esq. (via CM/ECF)
Adam Kenny, Esq. (via CM/ECF)
Brian P. Trelease, Esq. (via CM/ECF)

